

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
CIVIL DIVISION

KATHRYN BAUMAN RUBENSTEIN,
filing on her own behalf
AND
As an **interested party** on behalf of
BETTY JOSEPHINE BAUMAN,
a party unable to file on her own behalf
AND
As an **interested party** on behalf of
JEFFREY DANIEL BAUMAN,
a party unable to file on his own behalf
PLAINTIFFS'

Vs.

**MARILYN BAUMAN GRANGER,
THEODORE JULIUS BAUMAN TRUST,
TED BAUMAN INVESTMENTS, INC.,
TED BAUMAN REALTY, INC.,
BETTY PRENTICE,
KIMBERLY ARMSTRONG,
Et al,
DEFENDANTS'**

CV 07-798

PLAINTIFF'S MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT

COMES NOW, Plaintiff, Kathryn Bauman Rubenstein, Pro se, and respectfully requests this Honorable Court to grant leave, thereby permitting Plaintiff to file a Third Amended Complaint, and states as follows:

1. Plaintiff filed her Complaint in this Court on September, 2007. Plaintiff's Motion for Leave to File Third Amended Complaint would occur on December 28, 2007.
2. All the defendants have not filed their Answers. The parties have not yet met to prepare the Case Management Report and this Court has not yet issued a Case Management Order. Neither party have engaged in discovery.

3. Plaintiff seeks leave of this Court to file a Third Amended Complaint. This Third Amended Complaint will not change the paragraphs of the Second Amended Complaint. Changes to the Second Amended Complaint involve the following:

- a. Removing Betty Jo Bauman as a Defendant.
- b. Adding Betty Jo Bauman as a Plaintiff; by her daughter, Kathryn Rubenstein acting as a near friend. Ms. Bauman is a person who is legally blind and legally incompetent and unable to act in her own behalf. Ms. Bauman's address is 501 Jamestown, Dothan, Alabama 36303;
- c. Adding Jeffrey Bauman as a Plaintiff by Kathryn Rubenstein a near friend in that Jeffrey Bauman is unable to act on his own behalf due to a medical disability. Jeff Bauman's address is P.O. Box 1956, Dothan, AL 36301;
- d. Replacing "Compensatory Bias" with "Bribery" throughout the Second Amended Complaint.
- e. Adding "The Theodore Julius Bauman Trust" as a Defendant The Theodore Julius Bauman Trust will be known as "The Trust" subsequently throughout this document. The current address for The Trust is, Theodore Bauman Trust, Care of Regions Bank Trust Department, P.O. Box 6507, Dothan, AL 36302.
- f. Adding "Ted Bauman Investments, Inc." as a Defendant. The current mailing address for Ted Bauman Investments is P.O. Box 56, Dothan, AL 36301.
- g. Adding "Bauman Realty, Inc." as a Defendant. the current mailing address for Bauman Realty is P.O. Box 56, Dothan, Alabama 36301.
- h. Adding Betty Prentice as a Defendant. Ms. Prentice's current address is 1609 Fern Drive, Dothan, 36301. Ms. Prentice was employed by Ted Bauman until the sale of Ted's Jewelers in 1996 and in charge of accounts receivable for Ted's Jewelers prior to and subsequent to the sale of Ted's Jewelers and is the mother in law of Nannette Pitcher.
- h. Adding Kimberly Armstrong as a Defendant. Ms. Armstrong's current address is 5062 Columbia Highway, Dothan, Alabama 36301. Ms. Armstrong is Lexa Dowling's life partner, Plaintiff Rubenstein has belief and knowledge that Ms. Armstrong holds financial assets including real estate which were gifted by Ms. Dowling utilizing funds Ms. Dowling received from bribery in these matters.
- i. Adding The Betty Jo Bauman Trust as a Defendant. The current mailing address for the trust is: The Betty jo Bauman Trust, care of, Regions Bank Trust Department, P.O. Box 6507, Dothan, AL 36302.

STATEMENT OF THE FACTS

Plaintiff, Kathryn Rubenstein subsequent to this court's request not to file any new Motions until the Court had the opportunity to review the Second Amended Complaint, discovered evidence which affects this cause of action and does change the character of this cause of action due to discovering that additional Defendants' and Plaintiffs' exist and that numerous torts occurred of which Ms. Rubenstein had no previous knowledge of and therefore does hereby Move this Court to allow her to take leave of court to file this Motion .

I. **Plaintiff Rubenstein found on or about November 11, 2007, that assets of the deceased, Ted Bauman exist outside of The Trust including Ted Bauman Investments, Inc. and Bauman Realty, Inc. which have been in operation prior to and subsequent to the July 11, 2001 death of Ted Bauman, yet said corporations have been converted to benefit certain defendants even though said corporations are not part of the Ted Bauman Trust and should have been divided EQUALLY among his heirs as per the 2000 Will of Ted Bauman.**

On or about June 1996, Ted Bauman who was suffering from Alzheimer's disease was coerced by defendants, **David Johnston & Alan Kamensky**, both who are attorneys' that profess to specialize in Tax Law, **Johnston, Hinesley, Flowers & Clenney, P.C , Marilyn Granger, Wayne Granger, Barbara Kamensky and Ross Kennedy & McDaniel and Associates** to sell his business; Ted's Jewelers in order to avoid estate taxes. In truth said defendants sought to cash out Ted Bauman's interest in Ted's Jewelers to divert his assets unto certain defendants and to prevent Jeffery Bauman who was a partner in Ted's Jewelers from continuing to have a job and career and to allow certain defendants would be able to receive cash upon the death of Ted Bauman instead of stock in Ted's Jewelers.

Utilizing knowledge that Ted Bauman was having severe memory problems, said defendants conspired to convert Ted Bauman's portion of Ted's Jewelers into a "new corporation" in June 1996 (Exhibit 25); Ted Bauman Investments. Ted Bauman Investments comprised Ted Bauman's share of the sale of Ted's Jewelers which was approximately \$1,000,000.00 PLUS over \$1,000,000.00 from accounts receivable from Ted's Jewelers. With intent and malice, said defendants used a corporate name which had been previously incorporated in 1968 yet had ceased to exist for more than 20 years with Ted Bauman, Wayne Granger and Betty Jo Bauman as incorporators. (Exhibit 26).

Thus in 1998 when Ted Bauman suffered a stroke which accelerated his Alzheimer's disease, defendants **Marie Bauman, Alan Kamensky, Wayne Granger, Barbara Kamensky,**

Marilyn Granger, David Johnston, Don Bennett, Anne Chandler, Nanette Pitcher, Betty Prentice and Ross Kennedy conspired to convert Ted Bauman Investments, assets of Ted Bauman and Bauman Realty unto certain defendants and themselves. Defendants **Don Bennett, Anne Chandler, Marie Bauman & Nanette Pitcher** received bribes beginning in 1998 and continuing until approximately June 10, 2001 to prevent them from disclosing their knowledge of forgeries and conversion of assets of Ted Bauman.

II. Betty Jo Bauman, widow of Ted Bauman was prescribed and given ECT, Electro Convulsive Therapy (SHOCK TREATMENTS) on or about September 10, 1997 by Dr. Faye Ferrill leaving her incompetent. Mrs. Bauman was blinded as a result of a stroke on or about March 15, 1997 and the effects of glaucoma. Mrs. Bauman was purposefully overmedicated from September 1997 until 2001 by Dr. Ferrill in addition to being subjected to further ECT treatments on or about April 1999 by Dr. Ferrill. Ms. Bauman was found to be legally incompetent in 2001 in the Houston County Circuit Court, but a legal determination of her competency prior to 2001 has of yet not been established but would be determinable by a qualified forensic psychiatrist. Ms. Rubenstein avers on behalf of Betty Jo Bauman that **Marilyn Granger, Wayne Granger, Alan Kamensky, Barbara Kamensky, Marie Bauman, Don Bennett, David Johnston, Anne Chandler, Nanette Pitcher and Faye Ferrill** conspired to deny Betty Jo Bauman of her Constitutional Right to Life and Liberty by conspiring to have Ms. Bauman given extreme ECT and overmedicated in order that certain defendants' would be able On or about March 1999, said defendants had Betty Jo Bauman sign a new Will which was significantly different from previous Wills, also the The Betty Jo Bauman Trust was formed by the above referenced defendants when no trust had been requested nor signed by Mrs. Bauman previously. Defendants **Marie Bauman, Marilyn Granger, Wayne Granger, Alan Kamensky, Barbara Kamensky, Nanette Pitcher and Anne Chandler** conspired to loot assets of Betty Jo Bauman including her Trust of approximately One Million Dollars, (\$1,000,000.00), in cash from 1998 until 2000, plus personal assets and jewelry which had a value of approximately nine hundred thousand dollars, (\$900,000.00), The above referenced defendants conspired to loot the assets of Betty Jo Bauman and The Betty Jo Bauman Trust and to divert them unto themselves in order to avoid estate & gift taxes and to prevent Kathryn Rubenstein and Jeffrey Bauman from receiving ANY inheritance from their Mother, Betty Jo Bauman.

Beginning in September 1997 and continuing until December 25, 2000, Defendants, **Marilyn Granger, Wayne Granger, Anne Chandler, Don Bennett, Barbara Kamensky, Alan Kamensky, David Johnston, Faye Ferrill, Nanette Pitcher & Marie Bauman** conspired to Tortious Interference with a Mother-Child Relationship: Defendants vigorously and continuously tortiously used their position as Ms. Bauman's care-givers/ advocates to wrongfully interfere with the relationship between Ms. Bauman and her daughter, Kathryn Rubenstein. Said defendants sought to deny Ms. Rubenstein access including phone contact with her mother in order to prevent Ms. Rubenstein from discovering that said Defendants had looted and exploited Ms. Bauman's assets and were inflicting elderly abuse upon her by over medicating her, keeping

her a virtual prisoner in her home, and conspiring to give her ECT . The above said actions caused Ms. Bauman severe Emotional Distress and physical harm.

From June 2001 until the present time, Defendants, **Marilyn Granger, Wayne Granger, Lexa Dowling, Judge Larry Anderson, Dale Segrest, Judge Bernard Smithart, Tommy Scarborough, Jere Segrest, Barbara Kamensky, Alan Kamensky, David Johnston and Margaret Johnson**, conspired to Tortious Interference with a Mother-Child Relationship: Defendants vigorously and continuously tortiously used their position as Ms. Bauman's care-givers/advocates/guardians and guardian ad litem to wrongfully interfere with the relationship between Ms. Bauman and her daughter, Kathryn Rubenstein. The above said actions caused Ms. Bauman and Ms. Rubenstein severe Emotional Distress and physical harm.

1. THAT, Plaintiffs'/Contestant avers that Defendants set forth in Paragraphs **6, 7, 8, 9, 10, 11, 12, 13, 15, 19, 21, 22, 24, 25, 26, 27, 28, 34, 35 & 36** have breached their fiduciary duty unto Plaintiffs'/Contestants and/or stolen assets owned or intended for Plaintiffs' In that said defendants have been, and continue to be wanton and negligent in that they have:

a. **Conspired to defraud plaintiffs' by assuming control of assets of Ted Bauman including but not limited to; Ted Bauman Investments, Inc. The Ted Bauman Trust and Bauman Realty Inc. without legal authority.**

b. **Disbursed funds from Ted Bauman, Ted Bauman Investments, The Ted Bauman Trust and Bauman Realty unto themselves and unto certain defendants without legal authority.**

c. **Refused to provide to the Plaintiffs'/Contestant an accounting of Ted Bauman, Ted Bauman Investments, The Ted Bauman Trust and Bauman Realty.**

Beginning in 1998 and continuing until the present time, sold and/or

sought to sell real property from the Ted Bauman Trust for less than fair market value with the intent to remove said items from the Ted Bauman Revocable Trust which would leave a partial value of the property in the Trust and then an additional fee comprising the fair market value would be paid to Ted Bauman Investments, or Bauman Realty and/or Marilyn and/or Wayne Granger and/or Barbara and/or Alan Kamensky for the specific benefit of defendants' Marilyn & Wayne Granger & Barbara & Alan Kamensky.

The above referenced tortious actions caused Plaintiffs' to lose over \$10,000,000 in assets in addition to unnamed damages due to mental stress and anxiety.

2. THAT, Betty Jo Bauman avers that Defendants' set forth in Paragraphs **4, 5, 6, 7, 13, 15, 19, 21, 22, 25, 26** willfully and wantonly conspired to cheat and defraud her by conspiring to have Don Bennett steal the identity of Ted Bauman and to forge the Ted Bauman Revocable Trust and other documents beginning in 1998 until 2001 including deeding ONLY CERTAIN PARCELS of real estate owned by Ted Bauman into the Ted Bauman Revocable Trust causing her to lose over \$10,000,000.00 in addition to unnamed damages due to stress and anxiety;
3. THAT, Betty Jo Bauman avers that Defendants' set forth in Paragraphs **4, 5, 6, 7, 13, 15, 19, 21, 22, 25, 26** willfully and wantonly conspired to cheat and defraud her by conspiring to have Wayne Granger steal the identity of Ted Bauman and to forge the 2000 Will of Ted Bauman causing her to lose over \$10,000,000.00 in addition to unnamed damages due to stress and anxiety;
4. THAT, Betty Jo Bauman avers that Defendants' set forth in Paragraphs **4, 5, 6, 7, 13, 15, 19, 21, 22, 25, 26** willfully and wantonly conspired to cheat and defraud her

by conspiring to have her sign a new Will and a Trust Document in 1998 causing her to lose over \$8,000,000.00 in addition to unnamed damages due to stress and anxiety;

5. THAT, Betty Jo Bauman avers that Defendants' set forth in Paragraphs **4, 5, 6, 7, 13, 15, 19, 21, 22, 25, 26, 27 28** willfully and wantonly conspired to cheat and defraud her by conspiring to loot her personal assets including those in the Betty Jo Bauman Trust causing her to lose over \$8,000,000.00 in addition to unnamed damages due to stress and anxiety;
6. THAT, Plaintiffs'/Contestants' allege that Defendants' set forth in paragraphs **4, 5, 6, 7, 13, 15, 19, 21, 22, 25, 26, 27 28** willfully and wantonly conspired to cheat and and with intent to defraud them conspired to convert assets of Ted Bauman, Bauman Realty, The Ted Bauman Trust and Ted Bauman Investments unto themselves and/or advised defendants to convert and obscure said conversions of assets of Decedent, and/or did conspire to defraud Plaintiffs' and The United States Government and The State of Alabama of taxes due them including but not limited to gift taxes by converting assets, having knowledge of said conversions, and advising parties herein to convert assets including real property owned by Decedent, Ted Bauman during his lifetime and subsequent to his death unto themselves and unto third parties with blatant disregard for any laws and/or without any legal authority causing them to lose \$10,000,000.00 in addition to unnamed damages due to stress and anxiety;
7. THAT, Betty Jo Bauman alleges that Defendants' set forth in paragraphs **4, 5, 6, 7, 13, 15, 19, 21, 22, 25, 26, 27 28** individually and as a group did maliciously conspire to and with intent to defraud her and to defraud The United States Government, and The

State of Alabama of taxes including but not limited to gift taxes due them by said
 aforementioned Defendants' conversion of personal assets of Ted Bauman comprising
 jewelry left after the sale of Ted's Jewelers and owned by Ted Bauman which was
 shipped by Ted Bauman from Dothan, Alabama in 1998 to Wayne Granger in North
 Carolina for Wayne Granger to sell and which he was to remit the proceeds unto Ted
 Bauman, diamonds, gold, precious and semi precious stones which were valued in total at
 approximately Eight Hundred Thousand (\$800,000.00) Dollars unto themselves and unto
 each other by and through interstate transportation utilizing the United States Mail
 causing her to lose Five Hundred Thousand Dollars, (\$800,000.00) in inheritance;

8. THAT, Betty Jo Bauman alleges that defendants set forth in paragraphs **4, 5, 6, 7, 9, 10, 13, 14, 15, 16, 15, 19, 21, 22, 23, 25, 26, 27, 28** did conspire to cheat and defraud her by initiating, issuing and/or granting mortgages, mortgage payoffs and/or the financial where withal to finance and/or pay off said mortgages and/or to purchase and/or were gifted automobiles and/or boats and/ or real property including stocks to, Houston County Circuit Judge, Larry Anderson, Special Appointed Judge Dale Segrest and Special Appointed Judge Bernard Smithart while each judge presided in their official capacity as Circuit Judge over proceedings in the Houston County Circuit Court over Cases CV-5063, CV-5012 & CV-5013 involving the Decedent and/or Betty Jo Bauman and/or their individual and marital assets, and/or care of and for Betty Jo Bauman, in addition to expenses allegedly for Betty Jo Bauman in exchange for favorable and preferential proceedings and rulings for Defendants in said causes of actions and Defendants **37, 38, 39, 40, 41, 42, 43, 44, & 45** received bribery and kickbacks involving the

above referenced cause of actions causing Betty Jo Bauman to lose more than \$100,000,000.00 in addition to unnamed damages for stress and anxiety;

9. THAT, Plaintiff/Contestant Rubenstein alleges that Defendants set forth in paragraphs **6, 9, 13, 14**, did conspire to defraud Plaintiff, Kathryn Rubenstein by bribery of attorneys' Ramsey and Hamilton who had been hired by her to represent her in case CV-5063, causing her to lose \$175,000,000.00;
10. THAT, Plaintiffs'/Contestant/s allege that Defendants set forth in paragraphs **4, 5, 6, 7, 9, 10, 11, 12, 13, 15, 19, 21, 22, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 39, 41, 43, Tommy Scarborough & Jere Segrest** did conspire to defraud Betty Jo Bauman and to deny Kathryn Bauman Rubenstein & Jeffrey Bauman of their rightful inheritance by advising certain defendants to loot and/or aiding and abetting in the coverup of said looting of the assets of the Betty Jo Bauman Revocable Trust of over one million dollars beginning in 1998 and continuing until the present date, while Ms. Bauman was blind and mentally incompetent causing Plaintiffs' to lose over \$1,000,000 in assets in addition to unnamed damages for stress and anxiety;
11. THAT, Plaintiffs'/Contestant/s allege that Defendants set forth in paragraphs **4, 5, 6, 7, 9, 10, 11, 12, 13, 15, 19, 21, 22, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 39, 41, 43, Tommy Scarborough & Jere Segrest** conspired to defraud Betty Jo Bauman and to deny Kathryn Rubenstein & Jeffrey Bauman of their rightful inheritance by looting, advising certain Defendants to loot and/or aiding and abetting in the cover up regarding stolen personal property of Betty Jo Bauman including her household goods, and personal

jewelry valued at over \$800,000.00 (Eight Hundred Thousand Dollars), from 1997 until the present date, while Ms. Bauman was blind and mentally incompetent;

12. THAT, Plaintiff's/Contestant/s allege that Defendants, **Lexa Dowlinig, Jere Segrest & Tommy Scarborough**, did conspire to defraud Betty Jo Bauman by aiding and abetting in the cover-up of the looting of the assets of Betty Jo Bauman when said defendants had the legal authority and fiduciary duty unto Betty Jo Bauman to investigate thefts of the Betty Jo Bauman Revocable Trust and of personal property owned by Betty Jo Bauman and her deceased spouse, Ted Bauman, and that said Defendants were involved in bribery kickbacks and from their compensation received as Guardian ad Litem and Guardian of Betty Jo Bauman to Judges Anderson, Smithart and Dale Segrest beginning in July 2001 and continuing until the present time causing Plaintiffs' to lose over \$5,000,000 in addition to unnamed damages for stress and anxiety;
13. THAT, Plaintiffs'/Contestants' allege that Defendants', **Lexa Dowling, Jere Segrest & Tommy Scarborough** did conspire to exploit Betty Jo Bauman by billing exorbitantly for their services as Guardian and/or Guardian ad Litem for Betty Jo Bauman as allowed by Defendants', **Regions Bank, Barbara Kamensky and Marilyn Granger and Judges' Anderson, Smithart and Segrest** which in fact constitutes bribery, causing Plaintiffs' to lose over \$500,000 in addition to unnamed damages for stress and anxiety;
14. That Plaintiffs'/Contestants allege that Defendants' , **Lexa Dowling, Jere Segrest, Tommy Scarborough, Judges' Segrest & Smithart and Barbara Kamensky, Alan Kamensky, Wayne Granger, Marilyn Granger** conspired to deny Betty Jo Bauman of her Constitutional rights to Life and Liberty by denying Betty Jo Bauman a specific medical

procedure which would have removed fluid from her brain which was causing her develop normal pressure hydrocephalus. Said procedure which had been requested by her Neurologist, Dr. Hassan Kesserwani, on or about May 10, 2004 had the potential to return Ms. Bauman to competency; furthermore, the denial of that procedure caused Ms. Bauman to have **temporal lobe seizures** in January 2006 as a result of fluid left on her brain which left Ms. Bauman in a virtual vegetative state up until and including the present date. Each of the above Defendants' continue to conspire to this day to deny Mrs. Bauman the procedure which would remove fluid from her brain and aide her in her daily quality of life with the specific intent to force Ms. Bauman to remain incompetent in order to prevent the possibility Ms. Bauman would demand her assets from those parties who had looted them and those who had conspired to alter her will; said tortious actions caused and continues to cause Plaintiffs' unnamed damages for emotional stress, and anxiety in addition to physical pain for Plaintiff, Betty Jo Bauman;

15. Plaintiff, Betty Jo Bauman avers that or about June 1996, Ted Bauman who was suffering from Alzheimer's disease was coerced by Defendants, **David Johnston & Alan Kamensky**, both who are attorneys' that profess to specialize in Tax Law, **Johnston, Hinesley, Flowers & Clenney, P.C** , **Marilyn Granger, Wayne Granger, Barbara Kamensky** and **Ross Kennedy & McDaniel and Associates** to sell his business; Ted's Jewelers in order to avoid estate taxes. In truth said defendants sought to cash out Ted Bauman's interest in Ted's Jewelers to divert his assets unto certain defendants and to prevent Jeffery Bauman who was a partner in Ted's Jewelers from continuing to have a job and career and to allow certain defendants would be able to receive cash upon the

- death of Ted Bauman instead of stock in Ted's Jewelers. Said actions caused Mrs. Bauman \$20,000,000 in damages in addition to unnamed damages for stress and anxiety;
16. Plaintiff, Betty Jo Bauman avers that Defendants' **27, 28, 19, 13, 15, 4, 5, 6, 7,** conspired to convert Ted Bauman's portion of Ted's Jewelers into a "new corporation" in June 1996; Ted Bauman Investments. Ted Bauman Investments comprised Ted Bauman's share of the sale of Ted's Jewelers which was approximately \$1,000,000.00 PLUS over \$1,000,000.00 from accounts receivable from Ted's Jewelers causing Betty Jo Bauman to lose over \$2,000,000 plus of yet unnamed damages for stress and anxiety;
17. Plaintiff, Betty Jo Bauman avers that Defendants' **Marie Bauman, Alan Kamensky, Wayne Granger, Barbara Kamensky, Marilyn Granger, David Johnston, Don Bennett, Anne Chandler, Nanette Pitcher, Betty Prentice and Ross Kennedy** conspired to convert Ted Bauman Investments, assets of Ted Bauman and Bauman Realty unto certain Defendants and unto themselves.
18. Betty Jo Bauman avers that Defendants' **Don Bennett, Anne Chandler, Nanette Pitcher & Marie Bauman** received bribes beginning in 1998 and continuing until approximately June 10, 2001 from **The Ted Bauman Trust, The Betty Jo Bauman Trust, Ted Bauman Investments** and **Bauman Realty** by and through the actions of Defendants's **Marilyn Granger, Wayne Granger, David Johnston, Alan Kamensky, Barbara Kamensky** to prevent them from disclosing their knowledge of forgeries and conversions of assets of Ted Bauman which caused Betty Jo Bauman to lose over \$5,000,000 in addition to unnamed damages for stress and anxiety;

19. Betty Jo Bauman avers that Defendants' **Faye Ferrill, Marilyn Granger, Wayne Granger, Barbara Kamensky, Alan Kamensky, Don Bennett and David Johnston** conspired to give Betty Jo Bauman ECT, Electro Convulsive Therapy (SHOCK TREATMENTS) on or about September 10, 1997 with the specific intent to damage her mentally. Said action caused Mrs. Bauman physical pain in addition to stress and anxiety and loss of quality of life;
20. Betty Jo Bauman avers that Defendants' **Faye Ferrill, Marilyn Granger, Wayne Granger, Barbara Kamensky, Alan Kamensky, Anne Chandler, Nanette Pitcher, Don Bennett and David Johnston** conspired to give Betty Jo Bauman ECT, Electro Convulsive Therapy (SHOCK TREATMENT) and to over medicate her on or about March 1999 with the specific intent to damage her mentally. Said action caused Mrs. Bauman physical pain in addition to stress and anxiety and loss of quality of life;
21. Plaintiff, Betty Jo Bauman avers that Defendants' **Marie Bauman, Marilyn Granger, Wayne Granger, Alan Kamensky, Barbara Kamensky, David Johnston, Nanette Pitcher and Anne Chandler** conspired to loot assets of Betty Jo Bauman including her Trust of approximately One Million Dollars, (\$1,000,000.00), in cash from 1998 until 2000, plus personal assets and jewelry which had a value of approximately nine hundred thousand dollars, (\$900,000.00). Said tortuous actions caused Plaintiff to lose \$1,900,000 plus interest and unnamed damaged due to stress and anxiety;
22. Plaintiff, Betty Jo Bauman avers that Defendants', **Marilyn Granger, Wayne Granger, Anne Chandler, Don Bennett, Barbara Kamensky, Alan Kamensky, David Johnston, Faye Ferrill, Nanette Pitcher & Marie Bauman** beginning in 1997 until July 2001 conspired to Tortious Interference with a Mother-Child Relationship: Defendants vigorously and continuously tortiously used their position as Ms. Bauman's care-givers/ advocates to wrongfully interfere with the relationship between Ms. Bauman and her daughter, Kathryn Rubenstein. Said defendants and physical harm sought to deny Ms. Rubenstein access including phone contact with her mother in order to prevent Ms. Rubenstein from discovering that said Defendants had looted and exploited Ms. Bauman's assets and were inflicting elderly abuse upon her by over medicating her, keeping her a virtual prisoner in her home, and conspiring to give her ECT . The above said actions caused Ms. Bauman severe Emotional and mental Distress and physical harm which


comprise unnamed financial damages;

23. Plaintiffs' Kathryn Rubenstein & Betty Jo Bauman aver that Defendants, **Marilyn Granger, Wayne Granger, Lexa Dowling, Judge Larry Anderson, Dale Segrest, Judge Bernard Smithart, Tommy Scarborough, Jere Segrest, Barbara Kamensky, Alan Kamensky, David Johnston and Margaret Johnson**, conspired to Tortious Interference with a Mother-Child Relationship: Defendants vigorously and continuously tortiously used their position as Ms. Bauman's care-givers/advocates/guardians and guardian ad litem to wrongfully interfere with the relationship between Ms. Bauman and her daughter, Kathryn Rubenstein. The above said actions caused Ms. Bauman and Ms. Rubenstein to suffer severe Emotional & Mental Distress of as yet, unnamed financial damages;

24. Plaintiff, Betty Jo Bauman avers that Defendant, **Margaret Johnson** received bribery from Defendants's **Jere Segrest, Tommy Scarborough, Michael Conoway** and other as of yet unnamed Defendants who will be revealed during discovery. Said bribery was to prevent Mrs. Bauman and her daughter, Kathryn Rubenstein from having contact and to bribe Ms. Johnson with regard to a report for the Court regarding visitation recommendations between Ms. Rubenstein and Mrs. Bauman. Said bribery caused Betty Jo Bauman \$100,000,000 in damages in addition to unnamed damages for stress and anxiety;

WHEREFORE, Plaintiffs'/Contestants' pray that this Court will set these matters for hearing and that the issues involved herein will be made up and tried in this Court expeditiously at a time and place conducive to this Courts calendar. The Plaintiffs'/Contestants' pray that this Court will disallow all Defendants from profiting in any manner by their tortuous actions. The Plaintiffs'/Contestants' pray for such other, further, or more general relief to which they may, in equity and good conscience, be entitled.

Respectfully submitted this 27th day of December 2007

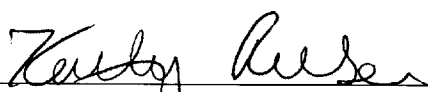

KATHRYN BAUMAN RUBENSTEIN, Attorney Pro Se
P. O. Box 2243, Dothan, AL 36302

(334) 803-2526

PLAINTIFF/CONTESTANT DEMANDS TRIAL BY JURY PURSUANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE SERVED A COPY OF THE ABOVE AND FOREGOING TO: William L. Lee, III, Esq. P.O. Box 1665, Dothan, AL 36302 , Stephen G. McGowan, Esq. P.O. Box 2101, . Dothan, Alabama 36302, William Hinesley, P.O. Box 2246, Dothan, AL 36302, Dothan, AL 36302, Joel Weatherford, Esq., Farmer, Price, Hornsby & Weatherford, P.O. Drawer 2228, Dothan, AL 36302, Don Bennett, Esq., P.O. Box 1392, Dothan, AL 36302, Mike Conaway, Esq. 360 N. Oates, St. Dothan, AL 36303, Tommy Scarborough, Esq. 119 S. Foster St. Dothan, AL 36301, Jere Segrest, Esq., P.O. Box 1469, Dothan, AL 36302, Arthur Medley, Esq., 114 N. Oates Street, Dothan, AL 36303, Margaret Johnson, Houston County DHR, 3201 Ross Clark Circle, S.E. Dothan, AL 36301, Houston County DHR, 3201 Ross Clark Circle, S.E. Dothan, AL 36301, , Richard Fox, Tallahassee Florida, FL 33921, Robert Merrill Girardeau, Esq., Three Protective Center, 2801 Highway 280 S. Suite 200, Birmingham , The Segrest Law Firm, 301 King Street, P.O. Box 780791, Tallahassee, AL 36078, John A. Smyth, III, Maynard, Cooper & Gale, P.C., 1901 6th Avenue North, 2400 AmSouth/Harbert Plaza, Birmingham, AL 35203, Anne Stone Sublin, Esq., Walston Wells & Birchall, LLP, P.O. Box 345, Kinston, AL 36453. James D. Hamlett, Esq. 621 S. Hull Street, Montgomery, AL 36104, Houston County DHR & Margaret Johnson, 3201 Ross Clark Circle, Dothan, AL 36301, Gary Clayborn Sherrer, Esq., Sherrer, Jones & Terry, P.C. 335 West Main Street, Dothan, AL 36301, James Davis Farmer & Virginia Lynn McInnis, Farmer, Farmer & Malone, PA, 112 West Troy Street, P.O. Drawer 668, Dothan, AL 36303, Wade Hampton Baxley, Ramsey, Baxley & McDougle, P.O. Box Drawer 1486, Dothan, AL 36302, Richard Ramsey, III Esq., 256 Honeysuckle Road, Suite 26, Dothan, AL 36305. R. Cliff Mendheim, Esq., Buntin, Etheridge & Dowling, P.O. Box 1193, Dothan, AL 36302, The Ted Bauman Trust P.O. Box 6507, Dothan, AL 36302, The Betty jo Bauman Trust, P.O. Box 6507, Dothan, AL 36302, Ted Bauman Investments, P.O. Box 56, Dothan, AL 36301, Bauman Realty, P.O. Box 56, Dothan, AL 36301, Jeff Bauman, P.O. Box 1956, Dothan, AL 36301, Betty jo Bauman 501 Jamestown Blvd., Dothan, AL 36303, by placing a copy of the same in the United States Mail, properly addressed and postage prepaid, this 27 day of December, 2007:


KATHRYN BAUMAN RUBENSTEIN, Attorney Pro Se
P. O. Box 2243, Dothan, AL 36302
(334) 803-2526



TRANSACTIONS

Office of the Secretary of State
State of Alabama



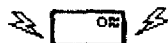
Corporation

D/C 018-241

Legal Name: Ted Bauman Investments, Inc.

----- Legal Name Changed From: -----

06-07-1996... Ted's Jewelers, Inc.



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CORPORATE DETAILS

Office of the Secretary of State
State of Alabama

CORPORATE DETAILS

Corporation D/C 018-241
Legal Name: Ted Bauman Investments, Inc.

Place Of Inc: Houston County

Date Of Inc.: 02-11-1968

Reg Agent...: * Not On Data Base

Prin Address: DOTHAN, AL

Capital Amt.: \$10,000 Authorized \$10,000 Paid In

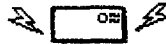
Nat Of Bus...: ---

Names Of Inc: BAUMAN, THEODORE J
BAUMAN, BETTY JO
GRANGER, B WAYNE

TRANSACTION

2006

TRANSACTION



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ANNUAL REPORT DETAILS

Office of the Secretary of State
State of Alabama

INITIATE NEW BROWSE

2006 Annual Report

Reporting

Address...: TED BAUMAN INVESTMENTS INC .
PO BOX 56
DOTHAN, AL 36302-0056

Agent As

Reported...: BAUMAN, TED
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

President

Of Corp...: BAUMAN, THEODORE J
PO BOX 2241
DOTHAN, AL 36302-2241

Secretary

Of Corp...: BAUMAN, THEODORE J
PO BOX 2241
DOTHAN, AL 36302-2241

General

Business...: RETAIL JEWELRY
2956 ROSS CLARK CR
DOTHAN, AL 36301

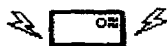
Telephone

Number....: **334-792-6624**

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By Revenue: 06-19-2007

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ANNUAL REPORT DETAILS

Office of the Secretary of State
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1999 Annual Report

Reporting

Address...: BAUMAN REALTY INC
1600 TACOMA ST
DOTHAN, AL 36303-3274

Agent As

Reported...: BAUMAN, TED
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

President

Of Corp...: BAUMAN, TED
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

Secretary

Of Corp...: BAUMAN, BETTY J
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

General

Business...: RENTALS
601 JAMESTOWN BLVD
DOTHAN, AL 36301

Telephone

Number....: **334-677-7656**

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ANNUAL REPORT DETAILS

Office of the Secretary of State
State of Alabama

INITIAL REPORT

2000 Annual Report

Reporting

Address...: BAUMAN REALTY INC
PO BOX 56
DOTHAN, AL 36302-0056

Agent As

Reported...: BAUMAN, TED
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

President

Of Corp...: BAUMAN, TED
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

Secretary

Of Corp...: BAUMAN, BETTY J
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

General

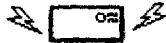
Business...: RENTALS
601 JAMESTOWN BLVD
DOTHAN, AL 36301

Telephone

Number....: **334-677-7656**

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INITIATE NEW BROWSE

2006 Annual Report

Reporting

Address...: BAUMAN REALTY INC
PO BOX 56
DOTHAN, AL 36302-0056

Agent As

Reported...: BAUMAN, TED
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

President

Of Corp...: BAUMAN, TED
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

Secretary

Of Corp...: BAUMAN, BETTY J
601 JAMESTOWN BLVD
DOTHAN, AL 36301-6407

General

Business...: RENTALS
601 JAMESTOWN BLVD
DOTHAN, AL 36301

Telephone

Number....: **334-677-7656**

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